I. INTRODUCTION

This source has applied for a renewal Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. The conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

Wheatland Tube Company is located at 4435 South Western Boulevard in Chicago, IL. Wheatland Tube manufactures electrically welded carbon steel tubular products on four similar mills. The major difference between the four mills is the size of the tubing that can be produced. The products are in-line galvanized, coated on the outer diameter with either a UV-cured or a negligible-VOM coating, and on the inner diameter with a low-VOM solvent-based coating.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission		Date	Emission Control	
Unit	Description	Constructed	Equipment	
01	In Line Paint Line 1	1/1990	Wet Scrubber 1	
02	In Line Paint Line 2	3/1990	Wet Scrubbers 2 and 3	
03	Off Line Paint Line 1	1970	Wet Scrubbers 4 and 5	
04	Off Line Paint Line 2	8/1992	Wet Scrubbers 6 and 7	
05	End Spray Packaging Line 1	1986	None	
06	End Spray Packaging Line 2	1986	None	
07	HCl Cleaning Mill 1	1970	Acid Fume Scrubber	
08	HCl Cleaning Mill 2	1970	Acid Fume Scrubber	
09	Hot Dip Galvanizing Mill 1	1970	Zinc Dust Collector	
10	Hot Dip Galvanizing Mill 2	1970	Zinc Dust Collector	
11	Thread Metallizer	2/1992	Wet Scrubber 8	
12	HCl Storage Tank	1970	None	
19	Hot Dip Galvanizing Kettle 3	1/1998	Cyclone Dust Collectors	
20	Paint Station	1/1998	6 Scrubbers	
21	HCl Storage Tanks	1/1998	None	
22	Hot Dip Galvanizing Kettle #4	10/2002	Cartridge Dust Collector	
23	Paint Stations and Cutoff	10/2002	Scrubbers	
24	Endspray Paint Station	10/2002	None	

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted	Emissions	of	Regulated	Pollutants
-----------	-----------	----	-----------	------------

Pollutant	Tons/Year
Volatile Organic Material (VOM)	244.6
Sulfur Dioxide (SO ₂)	0
Particulate Matter (PM)	55.9
Nitrogen Oxides (NO _x)	0
HAP, not included in VOM or PM (e.g., HCl)	0.5
Total	301.0

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

Because this source is located in the Chicago ozone nonattainment area and emits volatile organic material, the permit includes conditions to implement the Emission Reduction Market System (ERMS). The ERMS is a market-based program designed to reduce emissions from stationary sources to contribute to further reasonable progress toward attainment, as further described in section 6 of the permit. The permit contains the Illinois EPA's determination of the source's baseline emissions and allotment of trading units under the ERMS.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

JS:96030029:psj